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2 Timothy L. Bradley
3 9010 Gee Street
4 Juneau, Alaska 99801
5 Phone: (907) 321-4441
6 Email: woodworkalaska@gmail.com

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JAN 15 2025

Clerk, U.S. District Court
Juneau, AK

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

Timothy L. Bradley, Plaintiff Pro Se

Case No.: 1:24-CV-00017-SLG

V.

**PLAINTIFF'S REQUEST FOR JUDICIAL
NOTICE**

Nationstar Mortgage LLC, et al.,
Defendants

EXHIBIT-LL corporate filings, Aldridge Pite LLP(
attorneys for Clear Recon Court) Clear Recon
Corp (substituted trustee)

PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE

TO THE HONORABLE COURT, DEFENDANTS, AND THEIR COUNSEL OF RECORD:

Plaintiff Timothy L. Bradley, in support of pending motions before this Court, respectfully requests that the Court take judicial notice, pursuant to Federal Rule of Evidence 201, of the attached Exhibit LL. Exhibit LL consists of public records from the Alaska Department of Commerce, Community, and Economic Development, Division of Corporations, Business, and Professional Licensing. These

January 11th 2025 PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE EXHIBIT- LL

documents pertain directly to the corporate relationships and ownership structure of Defendant Clear Recon Corp and Aldridge Pite, LLP.

BASIS FOR JUDICIAL NOTICE

Under Federal Rule of Evidence 201(b), a court may take judicial notice of facts that are “not subject to reasonable dispute” because they are “capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.” The attached Exhibit LL qualifies for judicial notice because it consists of official government filings obtained from the Alaska Department of Commerce’s public online records, a recognized source of reliable information.

CONTENT OF EXHIBIT LL

Exhibit LL-1 and LL-2:

1. Statement of Foreign Qualification for Aldridge Pite, LLP, filed on April 16, 2018, showing John G. Aldridge as a partner of Aldridge Pite, LLP.

Exhibit LL-3:

2. 2024 Biennial Report for Aldridge Pite, LLP, confirming its physical address at 3525 Piedmont Road, NE, Suite 700, Atlanta, GA, which is the same address as Clear Recon Corp’s corporate offices.

Exhibit LL-4 and LL-5:

3. Foreign Business Corporation Biennial Report for Clear Recon Corp (2025) listing John G. Aldridge, Jr., P.C. as the 75% owner and Steven Pite as a 15% owner of Clear Recon Corp.

1 **RELEVANCE OF EXHIBIT LL**

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3 The contents of Exhibit LL demonstrate a significant overlap in ownership and operational control
4 between Aldridge Pite, LLP (previous attorneys for all defendants including Clear Recon Corp (the
5 substituted trustee). This overlap raises serious concerns about Clear Recon Corp's ability to act as an
6 impartial trustee in the foreclosure process. Specifically, Aldridge Pite LLP controlling ownership stake
7 in Clear Recon Corp creates an inherent conflict of interest.

8
9 **REQUEST FOR COURT ACTION**

- 10 1. Plaintiff requests that the Court:Take judicial notice of the attached Exhibit LL, including all
11 pages and sub-exhibits, as outlined above.
12
13 2. Consider this evidence in adjudicating pending motions including, motion to file Second
14 Amendment complaint as a matter of course out of time, the pending Motion to Rescind the
15 Foreclosure Sale, AND Plaintiff's intentions to Motion for Contempt related to Clear Recon
16 Corp and Aldridge Pite for the violation of a temporary restraining order.

17
18 plaintiff thanks to court for its time

19
20 **Affidavit of Truth**

21 I, Timothy L. Bradley, swear under penalty of perjury that the facts stated herein are true and correct

22
23 Date: January 14th 2025 in Juneau Alaska

24 Signature: X  01/14/25

25 Timothy L. Bradley pro se
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1 **CERTIFICATE OF SERVICE**

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3 I hereby certify that on January 15th 2025, I served a true and correct copy of the foregoing request
4 for judicial notice for exhibit- LL by USPS First-Class Mail to:

5 **Timothy Pomeroy** - attorney for defendants Clear Recon Corp and Aldridge Pite LLP

6 Aldridge Pite LLP

7
8 3333 Camino Del Rio South, Suite 225

9 San Diego, California 92108

10 **Justin Balser** - attorney for defendants Nationstar Mortgage LLC d/b/a Mr Cooper, and Elizon

11 Master participation trust 1, US Bank Trust National Association

12 Troutman Pepper Hamilton Sanders LLP

13 100 Spectrum Center Drive, Suite 1500

14 Irvine, California 92614

15
16 **Date:** January 14th 2025, in Juneau Alaska

17 **Signature:** X

 1/14/25

18 **Timothy L. Bradley Pro se**
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